

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

FTX RECOVERY TRUST,

Plaintiff,

- against -

AMERICAN ACTION NETWORK, INC.,

Defendant.

Adv. Pro. No. 24-50189 (KBO)

Adv. Ref. Nos. 1, 3, 5, 16, 21, 26 & 30

FTX RECOVERY TRUST,

Plaintiff,

- against -

AMERICAN PROSPERITY ALLIANCE,

Defendant.

Adv. Pro. No. 24-50190 (KBO)

Adv. Ref. Nos. 1, 3, 5, 14, 19, 23 & 27

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

FTX RECOVERY TRUST,

Plaintiff,

- against -

CONGRESSIONAL LEADERSHIP FUND,

Defendant.

Adv. Pro. No. 24-50193 (KBO)

Adv. Ref. Nos. 1, 3, 5, 16, 21, 26 & 29

FTX RECOVERY TRUST,

Plaintiff,

- against -

ONE NATION, INC.,

Defendant.

Adv. Pro. No. 24-50200 (KBO)

Adv. Ref. Nos. 1, 3, 5, 14, 19, 24 & 28

FTX RECOVERY TRUST,

Plaintiff,

- against -

SENATE LEADERSHIP FUND,

Defendant.

Adv. Pro. No. 24-50202 (KBO)

Adv. Ref. Nos. 1, 3, 5, 14, 19, 24 & 27

CERTIFICATION OF COUNSEL

I, Richard S. Cobb, counsel to the FTX Recovery Trust (“Plaintiff”), hereby certify as follows to the best of my knowledge, information and belief:

1. On November 8, 2024, Plaintiff² commenced the above-captioned adversary proceedings (the “Adversary Proceedings”) by filing complaints (the “Complaints”) against defendants American Action Network, Inc., American Prosperity Alliance, Congressional Leadership Fund, One Nation, Inc., and Senate Leadership Fund (collectively, “Defendants,” and together with Plaintiff, the “Parties”).

2. The Defendants’ deadlines to answer, move, or otherwise respond to the Complaints (the “Response Deadline”) was initially December 13, 2024.

3. Pursuant to rule 7004-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware, Plaintiff noticed the pretrial conference (the “Pretrial Conference”) for January 23, 2025 at 10:00 a.m. (ET) in each of the Adversary Proceedings.

4. On December 9, 2024, in each of the Adversary Proceedings, the Court entered the *Order Approving Stipulation for Extension of Time for Defendant to Answer, Move or Otherwise Respond to the Complaint*, extending the Response Deadline to February 14, 2025 and adjourning the Pretrial Conference to February 27, 2025 10:00 a.m. (ET).

5. On January 29, 2025, in each of the Adversary Proceedings, the Court entered the *Order Approving Second Stipulation for Extension of Time for Defendant to Answer, Move or Otherwise Respond to the Complaint*, extending the Response Deadline to March 31, 2025 and adjourning the Pretrial Conference to April 17, 2025 10:00 a.m. (ET).

² Pursuant to the *Order Granting the FTX Recovery Trust’s Omnibus Motion to Substitute Plaintiffs in Adversary Proceedings* [D.I. 29554], the FTX Recovery Trust is now the proper plaintiff and has substituted in for debtors FTX Trading Ltd., Alameda Research Ltd., West Realm Shires, Inc., West Realm Shires Services, Inc., and North Dimension Inc. that initially filed this action.

6. On March 28, 2025, in each of the Adversary Proceedings, the Court entered the *Order Approving Third Stipulation for Extension of Time for Defendant to Answer, Move or Otherwise Respond to the Complaint*, extending the Response Deadline to April 30, 2025 and adjourning the Pretrial Conference to May 14, 2025 9:30 a.m. (ET).

7. On April 30, 2025, in each of the Adversary Proceedings, the Court entered the *Order Approving Fourth Stipulation for Extension of Time for Defendant to Answer, Move or Otherwise Respond to the Complaint*, extending the Response Deadline to May 30, 2025 and adjourning the Pretrial Conference to June 25, 2025 9:30 a.m. (ET).

8. On May 29, 2025, in each of the Adversary Proceedings, the Court entered the *Order Approving Fifth Stipulation for Extension of Time for Defendant to Answer, Move or Otherwise Respond to the Complaint*, extending the Response Deadline to June 30, 2025 and adjourning the Pretrial Conference to July 22, 2025 at 9:30 a.m. (ET).

9. Plaintiff and the Defendants (together, the “Parties”) have conferred and agree to further extend the Response Deadline to and including July 30, 2025 for each of the Defendants and adjourn the date of the Pretrial Conference to August 12, 2025 at 9:30 a.m. (ET) in each of the Adversary Proceedings.

10. The Parties’ stipulation is attached as **Exhibit A** to the proposed form of order approving the stipulation, which is attached hereto as **Exhibit 1** (the “Order”).

11. Accordingly, the Parties respectfully request that the Bankruptcy Court enter the Order at its earliest convenience.

Dated: June 27, 2025
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Richard S. Cobb

Adam G. Landis (No. 3407)

Richard S. Cobb (No. 3157)

Matthew B. McGuire (No. 4366)

Howard W. Robertson, IV (No. 6903)

919 Market Street, Suite 1800

Wilmington, Delaware 19801

Telephone: (302) 467-4400

Facsimile: (302) 467-4450

E-mail: landis@lrclaw.com

cobb@lrclaw.com

mcguire@lrclaw.com

robertson@lrclaw.com

Counsel for Plaintiff